UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO WESTERN DIVISION

NANCY ROELL, as executrix of the

Case No. 1:14-CV-637

estate of Gary L. Roell, Sr.,

:

Plaintiff. :

Judge Sandra S. Beckwith

v.

Magistrate Judge Karen L. Litkovitz

HAMILTON COUNTY,

DECLARATION OF ALPHONSE A.

OHIO/BOARD OF

GERHARDSTEIN

COMMISSIONERS, et al.,

:

Defendants.

I, Alphonse A. Gerhardstein, pursuant to 28 U.S.C. §1746, declare under the penalty of perjury under the laws of the United States of America that the following is true and correct.

- 1. I am lead counsel for Plaintiff in the above action.
- 2. The following document was received from the Department of Hamilton County in the course of discovery.

Exhibit A. Internal Affairs Investigation # 24-13.

3. The following document is a public record and report generated by the United States

Department of Justice following its investigation of Cleveland's police department.

Exhibit B. Investigation of the Cleveland Division of Police, United States Department of Justice (Dec. 4, 2014).

 The following document is a public record and report generated by the President's Task Force on 21st Century Policing.

Exhibit C. Final Report of the President's Task Force on 21st Century Policing (May 2015).

5. The following document is a public record and report generated by the Ohio Task Force on Community Police Relations.

Exhibit D. Ohio Task Force on Community Police Relations Final Report (Apr. 29, 2015).

6. The documents above have been referenced in Plaintiff's Memorandum in Opposition to Defendant's Motion for Summary Judgment but have not been used as an exhibit or previously filed with the court. A copy of each document has been scanned and attached as part of this declaration.

Alphonse A. Gerhardstein
Dated: 3/24/16